

CUAUHTEMOC ORTEGA (Bar No. 257443)
Federal Public Defender
KATE L. MORRIS (Bar No. 332159)
(E-Mail: Kate.Morris@fd.org)
Deputy Federal Public Defender
321 East 2nd Street
Los Angeles, California 90012-4202
Telephone: (213) 894-2854
Facsimile: (213) 894-0081

Attorneys for Defendant
PHILIP ALAN DRECHSLER

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PHILIP ALAN DRECHSLER,

Defendant.

Case No. 23-CR-00216-RGK

**EX PARTE APPLICATION FOR
TEMPORARY RELEASE**

Philip Alan Drechsler, by and through counsel of record Deputy Federal Public Defender Kate L. Morris, hereby seeks files this ex parte application for temporary release under 18 U.S.C. § 3142(i). Under that subsection, in the case of a person previously ordered detained, “[t]he judicial officer may, by subsequent order, permit the temporary release of the person . . . to the extent that the judicial officer determines such release to be necessary . . . for a[] compelling reason.” *Id.*

This application is based on the arguments presented at the hearing on September 6, 2023, the accompanying declaration of counsel, all files and records in this case, and any further information as may be presented to the Court.

DECLARATION OF KATE L. MORRIS

I, Kate L. Morris, declare:

1. I am an attorney licensed to practice law in the State of California and admitted to practice in this Court. I am a Deputy Federal Public Defender for the Central District of California, and I have been appointed to represent Philip Alan Drechsler in the above-entitled action.

2. Mr. Drechsler is currently detained at the Metropolitan Detention Center (“MDC”).

3. For the reasons presented by defense counsel at the hearing on September 6, 2023, the defense is requesting a temporary release under 18 U.S.C. § 3142(i) under the terms and conditions set forth in the accompanying proposed order.

4. I emailed this Application to AUSAs Bruce Riordan and Kellye Ng on September 14, 2023. AUSAs Riordan and Ng advised me that the government opposes the Application. However, in the event the Court orders temporary release, the government agrees with the terms and conditions set forth in the accompanying proposed order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

DATED: September 14, 2023

By /s/ Kate L. Morris

Kate L. Morris